

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
APCO LIQUIDATING TRUST and) Case No. 05-12355 (BLS)
APCO MISSING STOCKHOLDER)
TRUST,) Jointly Administered
)
Reorganized Debtors.) Re: Docket No. 282

APPELLEES' COUNTER-DESIGNATION OF RECORD
WITH RESPECT TO "DESIGNATION OF RECORD AND
STATEMENT OF ISSUES ON APPEAL" [DOCKET NO. 282]

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, Apco Liquidating Trust and Apco Missing Stockholder Trust (collectively, the "Reorganized Debtors"), as appellees, hereby submit the following counterdesignation of additional items to be included in the record in connection with the appeal of the City of Wichita, Kansas ("Wichita") from the (i) Order, entered June 29, 2007 [Docket No. 278] and (ii) Memorandum Opinion, entered June 29, 2007 [Docket No. 277] in the above-captioned cases by the United States Bankruptcy Court for the District of Delaware (the Honorable Brendan L. Shannon), and respectfully submit as follows:

COUNTER-DESIGNATION OF RECORD¹

In addition to the items designated by Wichita to be included in the record on appeal, the Reorganized Debtors designate the following items to be included:²


Exhibit No.	Docket No.	Date	Description
1.	47	09/16/2005	Affidavit of Joseph L. King Concerning Service of Notice of Bar Dates For Filing of Proofs of Claim
2.	112	12/16/2005	First Amended Disclosure Statement with Respect to First Amended Liquidating Plan of Reorganization, As Further Revised
3.	113	12/16/2005	First Amended Liquidating Plan of Reorganization, As Further Revised
4.	135	01/11/2006	Stipulation Between City of Wichita, Kansas and Apco Liquidating Trust and Apco Missing Stockholder Trust to Allow Claim of City of Wichita, Kansas for Voting Purposes Only
5.	140	01/13/2006	Debtors' Motion Pursuant to Bankruptcy Rule 9019(a) for the Entry of an Order Approving Stipulation with the City of Wichita, Kansas
6.	147	01/20/2006	Affidavit of Joseph L. King Certifying, Voting on and Tabulation of Ballots of Creditors' Acceptance and Rejection of the First Amended Disclosure Statement With Respect to First Amended

¹ This designation of items is in addition to any record items listed in the *Designation of Record and Statement of Issues on Appeal* [Docket No. 282], filed July 19, 2007.

² The Reorganized Debtors reserve the right to amend this counterdesignation of additional items to be included in the record on appeal. For items designated, the designation includes all documents referenced within the particular document number, including, without limitation, all exhibits, attachments, declarations, and affidavits related thereto.

Exhibit No.	Docket No.	Date	Description
			Liquidating Plan of Reorganization, as Further Revised
7.	160	01/26/2006	Findings of Fact and Conclusions of Law and Order Confirming First Amended Liquidation Plan of Reorganization
8.	161	01/26/2006	Order Approving Stipulation With City of Wichita, Kansas
9.	251	02/15/2007	Agreed Scheduling Order
10.	253	02/23/2007	Transcript of Hearing held on January 18, 2007 before the Honorable Brendan L. Shannon
11.	276	06/13/2007	Notice of Submission of Subsequent Authority Pursuant to Local Bankruptcy Rule 7007-1(b)

Dated: July 30, 2007
Wilmington, Delaware



John H. Knight (No. 3848)
Jason M. Madron (No. 4431)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701

- and -

Neal H. Weinfield
Matthew F. Prewitt
GREENBERG TRAURIG LLP
77 West Wacker Drive
Chicago, IL 60601
Telephone: (312) 456-8400
Facsimile: (312) 456-8435

Counsel for the Liquidation Trustee